

J.E.B., individually and as next friend to	§
F.C.B.,	§
	§
Plaintiff(s)	§
	§
VS.	§
CLAY DEAN HILL, individually and	§
d/b/a SHILOH TREATMENT	§
CENTER, SHILOH TREATMENT	§
CENTER, INC.; JUAN J. SANCHEZ,	§
individually and d/b/a SOUTHWEST	§
KEY; AND SOUTHWEST KEY	§
PROGRAMS, INC.,	§
	§
Defendants	§

COMES NOW Defendant, Shiloh Treatment Center, Inc. (“Shiloh”), files its Original Answer to Plaintiffs’ Original Petition (“Petition”) and respectfully shows the Court as follows:

A. ADMISSIONS & DENIALS

Defendant Shiloh Treatment Center, Inc. generally and specifically denies each and every material allegation contained in Original Petition filed on behalf of the Plaintiffs in state court except for those which may be specifically admitted hereinafter.

1. Defendant lacks sufficient knowledge or information to form a belief about the truth of the averments in paragraph 1.

2. Paragraph 2 does not require a response from Defendant. To the extent that paragraph 2 does require a response, Defendant agrees to abide by the discovery rules set by this court.

3. Defendant lacks sufficient knowledge or information to form a belief about the truth of the averments in paragraph 3.

4. Defendant admits that Clay Hill is affiliated with Shiloh Treatment Center, but denies the averments in paragraph 4 as written.

5. Defendant admits paragraph 5.

6. Paragraph 6 does not require a response from Defendant.

7. Defendant lacks sufficient knowledge or information to form a belief about the truth of the averments in paragraphs 7-8 regarding Co-Defendants Juan J. Sanchez and Southwest Key Programs, Inc.

8. Paragraph 9 does not require a response from Defendant.

9. Defendant specifically denies the Jurisdiction & Venue paragraphs 10-12 as this case is properly removed to federal court.

10. Defendant lacks sufficient knowledge or information to form a belief about the truth of the allegation in this paragraph 13.

11. Defendant lacks sufficient knowledge or information to form a belief about the truth of the averments in paragraphs 14-24. In addition, the documents cited by Plaintiffs were not attached to the petition.

12. Defendant admits the portion of paragraph 25 that F.C.B. was admitted to Shiloh Treatment Center in Brazoria County on or about June 21, 2018, but lacks sufficient knowledge or information to form a belief about the truth of the rest of the paragraph. In addition, the documents cited by Plaintiffs were not attached to the petition.

13. Defendant lacks sufficient knowledge or information to form a belief about the truth of the averments in paragraphs 26-36. In addition, the documents cited by Plaintiffs were not attached to the petition.

14. Defendant denies the allegations in paragraphs 37-42.

15. Defendant does not need to respond to paragraph 43. To the extent that it may be necessary to respond, Defendant denies that Plaintiffs should be awarded any recovery.

16. Defendant does not need to respond to paragraph 44 regarding Requests for Disclosures.

17. Defendant does not need to respond to paragraph 45 (incorrectly numbered 42) regarding jury demand.

B. PRAYER

For these reasons, Defendant asks the Court to enter judgment that Plaintiffs take nothing, dismiss Plaintiffs' suit with prejudice, assess costs against Plaintiffs, and award Defendant all other relief the Court deems appropriate.

Respectfully submitted,
TRIBBLE ROSS

By: /s/ Wesson H. Tribble
Wesson H. Tribble
State Bar No. 20213960
Email: wtribble@tribblelawfirm.com
6371 Richmond Ave.
Houston, Texas 77057
Telephone: (713) 622-0444
Facsimile: (713) 622-0555
**ATTORNEY FOR DEFENDANT,
SHILOH TREATMENT CENTER, INC.**

CERTIFICATE OF SERVICE

On this the 13th day of May, 2019, I electronically submitted the foregoing document with the Clerk of Court of the United States District Court, Western District of Texas, using the Electronic Filing System of the Court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

VIA E-SERVICE:

John Judge
Judge, Kostura, & Putnam, P.C.
2901 Bee Cave Road, Box L
Austin, Texas 78746
jjudge@jkplaw.com
Attorney for Plaintiffs

Ricardo de Anda
De Anda Law Firm, P.C.
212 Flores Avenue
Laredo, Texas 78040
deandalaw@gmail.com
Attorney for Plaintiffs

Jay Harvey
Winckler & Harvey, LLP
4407 Bee Cave Road, Building 2, Suite 222
Austin, Texas 78746
jharvey@wincklerharvey.com
Attorney for Plaintiffs

Floyd H. Hartley, Jr.
Taylor | Anderson, LLP
1670 Broadway, Suite 900
Denver, Colorado 80231
fhartley@talawfirm.com
*Attorney for Co-Defendants
Juan J. Sanchez, individually and
d/b/a Southwest Key*

Wes Griggs
Law Offices of Wes Griggs
301 South 17th Street
P.O. Box 517
West Columbia, Texas 77486
wes@wesgriggslaw.com
*Attorney for Co-Defendant Clay Hill,
individually and as d/b/a Shiloh Treatment
Center*

/s/ Wesson H. Tribble
Wesson H. Tribble